

THE HONORABLE BARBARA J. ROTHSTEIN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

LEON CARP, individually and on behalf of others
similarly situated,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant.

No. 2:21-cv-01130-BJR

**STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER
COMPLAINT**

**STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER
(No. 2:21-cv-01130-BJR) - 1**

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

Under Western District of Washington Local Rules 7(d)(1) and 10(g), Plaintiff Leon Carp and Defendant T-Mobile USA, Inc., (“the Parties”), stipulate that T-Mobile’s deadline to answer or otherwise respond to the Complaint in the above-captioned action is extended through January 3, 2022.

Good cause exists for this extension, as there is a pending motion before the Judicial Panel on Multidistrict Litigation (“JPML”) regarding transfer and coordination or consolidation of related cases for pretrial proceedings under 28 U.S.C. § 1407, filed on August 23, 2021. *See In re T-Mobile Customer Data Security Breach Litigation.*, MDL Docket No. 3019 (ECF No. 1). The plaintiffs in another case, *Daruwalla v. T-Mobile USA, Inc.*, No. 2:21-cv-1118 (W.D. Wash. filed Aug. 19, 2021), filed the transfer motion and identified this case, and numerous others, as related cases that should be transferred. *Id.* (ECF Nos. 1, 8, 11, 20). The additional time will conserve judicial resources by allowing T-Mobile to assess the pending JPML motion and continue discussions with Plaintiff’s counsel here and counsel in the related cases before responding to Plaintiff’s Complaint.

Dated: October 27, 2021

By: /s/ Steve Y. Koh
 Steve Y. Koh, WSBA No. 23284
 Kathleen M. O’Sullivan, WSBA No. 27850
 Lauren J. Tsuji, WSBA No. 55839
PERKINS COIE LLP
 1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Telephone: 206.359.8000
 Facsimile: 206.359.9000
 E-mail: SKoh@perkinscoie.com
 KOSullivan@perkinscoie.com
 LTSuji@perkinscoie.com

Kristine McAlister Brown (*pro hac vice*)
ALSTON & BIRD LLP
 1201 West Peachtree Street

STIPULATION AND ORDER TO
 EXTEND TIME TO ANSWER
 (No. 2:21-cv-01130-BJR) - 2

Perkins Coie LLP
 1201 Third Avenue, Suite 4900
 Seattle, Washington 98101-3099
 Phone: 206.359.8000
 Fax: 206.359.9000

Atlanta, GA 30309
Telephone: (404) 881-7000
Facsimile: (404) 881-7777
E-Mail: kristy.brown@alston.com

Attorneys for Defendant T-Mobile USA, Inc.

By: /s/ Cari Campen Laufenberg
Cari Campen Laufenberg (WSBA 34354)
Gretchen Freeman Cappio (WSBA 29576)
Juli Farris (WSBA 17593)
Emma M. Wright (WSBA 56770)
KELLER ROHRBACK LLP
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Telephone: (206) 623-1900
Facsimile: (206) 623-3384
E-Mail: claufenberg@kellerrohrback.com
gcappio@kellerrohrback.com
jfarris@kellerrohrback.com
ewright@kellerrohrback.com

Attorneys for Plaintiff

STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER
(No. 2:21-cv-01130-BJR) - 3

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

ORDER

IT IS SO ORDERED.

Dated this 28th day of October, 2021.

s/Barbara J. Rothstein
Barbara J. Rothstein
U.S. District Court Judge

Presented by:

Steve Y. Koh, WSBA No. 23284
Kathleen M. O'Sullivan, WSBA No. 27850
Lauren J. Tsuji, WSBA No. 55839
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
E-mail: SKoh@perkinscoie.com
KOSullivan@perkinscoie.com
LTsuji@perkinscoie.com

Kristine McAlister Brown (*pro hac vice*)
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, GA 30309
Telephone: (404) 881-7000
Facsimile: (404) 881-7777
E-Mail: kristy.brown@alston.com
Attorneys for Defendant T-Mobile USA, Inc.

**STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER**
(No. 2:21-cv-01130-BJR) - 4

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000